

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

FRANKIE BROWN,)	
)	
Plaintiff,)	07 C 6490
)	
v.)	JUDGE DOW
)	
CITY OF MARKHAM and City of Markham)	
Police Officers HARRIS, D. Walker)	
(Star # 526), and UNKNOWN MARKHAM)	
POLICE OFFICERS)	
)	JURY TRIAL DEMANDED
Defendants.)	

JOINT MOTION TO EXTEND FACT DISCOVERY

Now Come Plaintiff, by and through his attorneys, Loevy & Loevy, and Defendants, by and through their attorney, LITCHFIELD CAVO, LLP, and submit the following:

1. Plaintiff filed a twelve-count complaint alleging unlawful search and seizure following the search of his home and his subsequent arrest. Defendants have denied each of the claims.
2. Pursuant to the Court's schedule, fact discovery closes on June 6, 2008. See Dckt. No. 26.
3. Both parties have worked diligently on discovery in this case. The parties have disclosed over two dozen witnesses, including third party witnesses and numerous police officers.
4. Despite efforts by both sides to complete fact discovery by June 6, there is some additional outstanding written and live discovery.

5. Plaintiff and Defendants therefore jointly request that this Court extend discovery by an additional 45 days to allow the parties to complete fact discovery. The parties have not previously requested an extension of fact discovery.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court extend the fact discovery cut-off by 45 days to July 21, 2008.

Respectfully Submitted,

/s/Russell Ainsworth

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